
DRAFT

**LOWCOUNTRY REGIONAL HOME
CONSORTIUM**

2014 ANNUAL ACTION PLAN

May 15, 2014

**HOME Investment Partnership Act (HOME)
Program**

Lowcountry Council of Governments

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Annual Action Plan

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2014 Annual Action Plan

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

2014 Annual Action Plan Executive Summary:

The Beaufort County/Lowcountry Regional HOME Consortium's (LRHC) Annual Action Plan for the program year beginning July 1, 2014, was prepared in accordance with Consolidated Plan regulations found in CFR 24, Part 91. The Action Plan is intended to meet certain requirements which include:

- 1) Provide the HOME Consortium and its members information on housing and community development needs;
- 2) Describe the current strategies the HOME Consortium has adopted to meet housing and community development needs; and
- 3) Raise awareness about housing and community development issues among the Lowcountry's citizens and policy makers and, whenever possible to coordinate available resources to address identified needs.

Developing affordable, safe and decent housing for low income citizens is a challenge for the HOME Consortium and its members. Funding from the HOME Investment Partnership Program is an important resource for the LRHC to design and implement housing programs that address the local housing needs. The HOME Program provides flexibility to its participating jurisdictions by offering them the opportunity to choose what types of housing programs and activities are most important to meet the housing needs of their low and very low income residents.

The LRHC has an obligation to see that resources are used effectively. The LRHC will utilize the HUD Performance Measurement Program to ensure program efficiency. Performance measurement can help the LRHC maximize productivity in the HOME Program. In a world of growing needs and declining resources, housing program managers are under increasing pressure to get the most out of funds allocated to their programs. Performance measurement is a process of data collection and analysis used to improve organizational results.

The Annual Action Plan provides a blueprint for the LRHC for the ways it will use HOME funds to meet local community revitalization goals and highlights the issues that the Consortium must consider when planning for such use. Homeownership development is a stabilizing force in a neighborhood and the annual Action Plan reviews the types of planning, design and marketing

issues that will need to be addressed to successfully develop housing in a deteriorated or declining neighborhood. Declining neighborhoods do not have a functioning neighborhood system. Often capital investment in a neighborhood has decreased or stopped entirely and the neighborhood is at risk economically and socially. In addition to the physical decline in these neighborhoods, social decline in the form of crime and drug abuse, aging housing stock, housing or retail vacancies, and poor service delivery are prevalent.

Of equal importance is the need to address other issues that will have an impact on the success of a neighborhood:

- is there enough housing available for special needs populations
- can the local (existing) infrastructure support development
- will employment opportunities be increased
- will the commercial environment be healthy

Although HOME funds can not be used to address every need, these areas will have an impact on the sustainability of HOME Funded housing. The goals and objectives adopted in this Action Plan are prioritized toward creating viable and sustainable neighborhoods, giving access to affordable housing, and determining the best means to address chronic homelessness in the Lowcountry.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.
4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

2014 Annual Action Plan General Questions response:

- 1) Jurisdictional Boundaries: The affordable housing, community and economic development needs of the LRHC are addressed through the HOME, CDBG, USED, and USDA-RD programs along with various other State and Federal initiatives. The Annual Action Plan covers the entirety of the Lowcountry Region with the exception of one municipality, Town of Lodge. Target areas for this Annual Action Plan are:

Beaufort County 48%, Jasper County 22%, Colleton County 15%, Hampton County 15%.

- 2) **Geographical Allocation of Investments:** HOME fund allocations were distributed to each Consortia member of local government based on the distribution of population. However, funds are allocated based on potential projects for the 2014 year. CHDO funding is distributed via approval of proposed projects submitted to the HOME Consortia and the direct correlation of those proposed projects to the priority needs addressed in the Consolidated Plan.
- 3) **Addressing Unserved Needs:** The Action Plan outlines several goals and objectives that address the identified needs that have been prioritized through the Consolidated Planning process. Included in the Plan are specific actions targeted to meeting the underserved needs, to include:

2014 Needs

- A. The need for affordable, safe and decent housing (rental & homeownership);
- B. The need for rehabilitation/replacement of substandard housing;
- C. The need for rental assistance;
- D. The need for home ownership opportunities for small related LMI families and individuals who are housing cost burdened and forced to rent substandard units;
- E. The need for preventative/restorative measures to address unhealthy living environments affecting children, frail elderly, and the disabled; and
- F. The need for a comprehensive strategy to target those who are homeless or at risk of becoming homeless, to include emergency shelters and resource centers, case management and support services, and transitional housing opportunities.

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

2014 Annual Action Plan Managing the Process response:

- 1) **Responsible Agency:** Beaufort County is the lead agency for the LRHC. The LRHC is comprised of the following member local governments: Beaufort, Colleton, Hampton and Jasper Counties and the municipalities of Beaufort, Bluffton, Hilton Head Island, Port Royal, Cottageville, Edisto Beach, Walterboro, Williams, Smoaks, Brunson, Estill, Furman, Gifford, Hampton, Luray, Scotia, Varnville, Yemassee, Hardeeville and Ridgeland. The Lowcountry Council of Governments (LCOG) administers the HOME program on behalf of the LRHC.

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- 2) **Planning Process:** The planning process involves data collection, a review of existing conditions, and structured dialogue with Region's stakeholders in order to develop a vision for the Region in the future. The LRHC, through the planning process, comes to a general agreement about the Region's future development and service delivery options. The development of the Plan involved many participants and a coordinated effort of coalition building among persons who will be either directly or indirectly impacted by the action proposed. Included in the planning process were the following groups: community development housing organizations, city and county planners, non-profit agencies working with the housing needs of special populations, to include elderly and disabled, the homeless, and those persons suffering from HIV/AIDS.
 - 3) **Enhancing Coordination:** The LRHC will enhance coordination between public/private housing, health, and social services agencies as they are considered key stakeholders in ensuring healthy communities. The LRHC will develop partnerships Region-wide with inter-agencies, community housing organizations, local housing authorities, various social service agencies and mental health, members of the real estate industry, and local lending institutions. Through the community needs assessment process, all partners and key stakeholders will be involved in the planning process and provide input on an on-going basis.

Citizen Participation

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

2014 Annual Action Plan Citizen Participation response:

The LRHC will use several techniques to maximize citizen participation in the development of the Consolidated Plan. These can be grouped into four categories:

- 1) **Publicity:** It is important early on and throughout the activities funded by the LRHC to inform the public in a general way about our programs. Standard publicity techniques that are used include press releases, newspaper ads, flyers, and public service announcements.

Two public hearings were held to receive comments on the 2014 Annual Action Plan. An ad for Public Hearing and Plan Availability for Review was advertised in at least one newspaper from each of the four counties in the region and allowed the required 30 day comment period. The Plan was made available for review at Lowcountry Council of Governments and the following counties: Beaufort, Colleton, Hampton and Jasper from April 1, 2014 – May 1, 2014.

Public hearings were scheduled as follows:

Date	Time	Location
April 7, 2014	6:15 pm	Hampton County Council Chambers 200 Jackson Avenue East Hampton, SC 29924
April 24, 2014	6:30 pm	Lowcountry Council of Governments (LCOG) Point South, SC (I-95 exit 33 at US Hwy. 17)

2) **Minutes:**

3) Efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities was the advertising of the public hearings and availability of the plan for review in a paper of general circulation in each of our four counties.

The LRHC has a Citizen Participation Plan that has been adopted to ensure that it complies with the State and local public and citizen participation requirements tied to specific re-development activities.

Comments received as a result of making the Plans available for review:

Institutional Structure

1. Describe actions that will take place during the next year to develop institutional structure.

2014 Annual Action Plan Institutional Structure response:

Public and private sector agencies, organizations, and institutions will contribute to the LRHC's delivery system for affordable housing and community development. These agencies and organizations are important development partners in the Lowcountry. All are vital resources in the HOME Consortium's continuing challenge to address affordable housing and improve community and economic development needs of lower income households. The following agencies and organizations contribute significant financial and technical resources to benefit low and moderate income individuals and families of the Lowcountry. The contributions made help capitalize outreach, education, and development initiatives. Private and local funds are leveraged with Federal and State funds in order to implement affordable housing and community development initiatives Region-wide. Each entity, public or private, pass-through, or direct provider, offers services to low income persons and is considered a critical component of the Lowcountry's housing and community development delivery system:

Federal:

- Department of Housing & Urban Development
- Department of Agriculture: Rural Development
- Department of Commerce: Community & Economic Development

State:

- Department of Commerce: Division of Grants Administration
- Department of Social Services
- State Housing Finance & Development Authority

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- Department of Health & Environmental Control
 - Department of Disabilities & Special Needs
 - Rural Economic Development Council
 - SC Department of Transportation

Local Government:

- Municipal and County Governments
- Public Housing Authorities

Non-Profit Organizations:

- Community Housing Development Organizations
- Non-profit Housing Development & Human Service Agencies
- Community Action Agencies
- Small Business Development Centers

The LRHC will, over the next year, initiate an organized process to gather information to determine how well programs and projects are meeting needs and then use that information for improving performance and target resources more precisely. With increasing needs and dwindling resources, housing program administrators must find new ways to make the most of the funds allocated to the program. Performance measurement is a process of data collection and analysis used to improve organizational results. When used effectively, it can help managers improve the efficiency and effectiveness of their programs. Performance measurement must be viewed in terms of productivity and program outcomes together. Performance measurement results are generally most valuable when evaluated in terms of the community's own needs. The LRHC will use performance measurement to:

- 1) strengthen the LRHC's organizational structure;
- 2) utilize HOME funds to meet more needs;
- 3) describe program accomplishments and build continued support for the programs;
- 4) provide informed program design, implementation, and reporting; and
- 5) build an effective program management team.

Similarly, performance measurement will be used in the LRHC's programs in their entirety to monitor program progress. Benchmarks will be established for the LRHC's partners to meet. When there is a failure to meet the benchmarks, the LRHC can use this information to provide technical assistance in order to assist the partner in moving forward.

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

2014 Annual Action Plan Monitoring response:

The HOME Program Monitoring is utilized in order for Beaufort County/Lowcountry Regional HOME Consortium (LRHC) and the HOME Program subrecipients and CHDOs to ensure

compliance with the HOME Program requirements. Governing regulations are at 24 CFR Part 92. The statutory changes found in the Housing and Community Development Act of 1992 (HCDA 1992) (Pub. L. 102-550), the HUD Demonstration Act (Pub. L. 102-120), and the Multifamily Housing Property Disposition Reform Act of 1994 (Pub. L. 103-223) govern the program as well.

LRHC's administrative staff will conduct periodic monitoring of all of its projects, subrecipients and CHDOs on an on-going basis. The Consortium will implement an annual monitoring and evaluation process to ensure that programs are carried out in accordance with the Consolidated Plan, written funding agreements, and HOME Program regulations.

Monitoring Objectives

The objectives are to ensure subrecipients and CHDOs:

- Comply with HOME Program regulations governing their administrative, financial, and programmatic operations.
- Produce quality affordable housing for low income households in an expeditious and cost-effective manner.
- Gain capacity to manage HOME funds they receive.

Monitoring Techniques and Strategy

Monitoring is an on-going process in all HOME projects. LRHC HOME Program staff maintains frequent contact with each HOME subrecipient or CHDO during every phase of the project. Staff is especially involved throughout the pre-development phase by providing technical assistance to project developers in determining HOME occupancy requirements and rent limitations. During the development stage staff provides oversight of housing activity as it relates to procurement and Davis-Bacon requirements (if applicable). At project completion staff continues its oversight of the project or program in order to measure compliance with the regulations on a long-term basis. Monitoring is provided as a means of providing technical assistance to each project in order to ensure activities are eligible, income and rental levels are appropriate, and program matching requirements are being met.

Risk analysis will be conducted by HOME Program staff to systematically analyze each HOME subrecipient or CHDO. This assessment is used to identify how frequently to contact the various subrecipients or CHDOs.

Various techniques are used to meet the goals of monitoring:

Desk monitoring is accomplished on projects and programs using written communication, telephone communication, and meeting with subrecipients or CHDOs. Separate files are established for each project and each CHDO, and are maintained at Lowcountry Council of Governments (LCOG). The LRHC HOME Program staff maintains a spreadsheet and various financial reports on HOME funds allocated, obligated, and expended as well as a matrix of accounting requirements for the HOME Program.

LRHC HOME Program staff provides program information and a project checklist of required documentation to each subrecipient or CHDO. LRHC HOME Program staff maintains various records in order to track the progress of all subrecipient and CHDO projects through all stages of their development. Project set-ups, match log, WMBE records, and project completion reports for each project are maintained at LCOG.

Housing quality standard inspections are conducted by the rehabilitation inspectors chosen per project. Qualified inspectors conduct inspections on all rehab projects. In the case of down payment assistance, qualified inspectors conduct inspections prior to obtaining an approval of assistance towards the purchase of the property. A report to correct deficiencies follows.

On-site monitoring is conducted during various phases of each project or program. Initially, subrecipients or CHDOs new to the LRHC HOME Program receive an on-site monitoring visit by the LRHC HOME program staff member for the purpose of technical assistance. This visit is conducted prior to the first request for payment for HOME funds.

The purpose is to increase the subrecipient's or CHDO's understanding of program requirements and to discuss the following:

- Eligible activities / allowable costs
- Compliance with OMB circulars
- Maintenance of appropriate program documentation / reporting requirements.
- Financial standards and systems
- Procurement procedures
- Building standards requirements
- Deadline for expenditure of funds

The subrecipients or CHDOs are notified in advance of the time of the visit.

Project Completion / Program Close-out

Upon completion of a project, the subrecipient or CHDO files a project completion report. The reports are reviewed by HOME program staff and filed with the HUD IDIS after a final on-site visit.

On-site HQS inspections are conducted every two years by certified LRHC HOME Program staff. In addition, where appropriate, Rural Development, state/county/local inspectors, and state licensing reports are also acceptable. HOME units associated with Section 8 subsidy are inspected annually by the local Housing Authority and reports are filed at the local Housing Authority Section 8 administrator's office.

Occupancy and rents are annually re-certified. The subrecipient or CHDO is notified in writing by the LRHC HOME Program staff each December and is required to complete a Unit Status Report which certifies each tenant's income and rent paid. Said report is due to the Community Development Division office in January of each year. The subrecipient or CHDO must re-examine each tenant's income on the anniversary of their original evaluation and lease signing.

This requirement is required during the period of affordability established for each project and assures that initial and future incomes of tenants meet the HOME program rules.

Corrective and Remedial Action

If it is determined that the subrecipient or CHDO has not met a requirement of the HOME Program, the Consortium will provide written notice of this determination and give the subrecipient or CHDO an opportunity to demonstrate within thirty days that it has done so. If unable to demonstrate compliance, the Consortium will take corrective action or remedial action. Said actions will be designed to prevent a continuation of the deficiency; mitigate; to the extent possible, its adverse effects or consequences; and prevent its recurrence.

Subrecipients or CHDOs may be required to submit and comply with proposals for action to correct, mitigate and prevent a performance deficiency through one or more of the following:

- Prepare and follow a schedule of actions for carrying out the affected activities, consisting of schedules, timetables, and milestones necessary to implement the affected activities;
- Establish and follow a management plan that assigns responsibilities for carrying out the remedial action;
- Cancel or revise activities likely to be affected by the performance deficiency, before expending HOME funding for the activity.

Minority Business Outreach W/MBE

Agreements with sub-recipients will incorporate requirements regarding Minority/Women Business Enterprise on all LRHC funded projects. LRHC will monitor files to ensure that subrecipients/CHDOs use their best effort to afford minority – and women-owned business enterprises the maximum practicable opportunity to participate in the performance of this contract.

Areas of Monitoring

Financial monitoring is conducted by the LRHC HOME Program staff. The areas of compliance monitoring include financial regulations and OMB circulars; program disbursements; equipment and records; financial management standards; procurement; conflict of interest; and audits. Records of financial monitoring are maintained at LCOG, 634 Campground Road, PO Box 98, Yemassee, SC 29945.

Administrative and programmatic monitoring is conducted by the LRHC HOME Program staff. The areas of compliance include eligible activity requirements, environmental compliance, occupancy/income targeting, affordability/rental limitations, housing quality standards and additional requirements stated in the National Affordable Housing Act and at 24 CFR Part 92.

With the rehabilitation work, a rehabilitation specialist will clarify the scope of work, address day-to-day construction issues, conduct inspections to confirm work quality, and facilitate payment of contractors. Due to prior performance, LRHC will use one rehab specialist for all rehab work in the region. The LRHC will maintain high production goals, with high homeowner satisfaction, and a minimum of liens or defaults of work. The rehabilitation process will be refined with regard to public body estimates, contractor selection, and owner education. The Rehabilitation

Specialist will document this process approving funds to be released, preparing punch lists, and establishing good working relationships with the contractors. This system of documentation of the process and progress on jobs will be important to provide evidence of compliance to funding sources and to defend the LRHC in the event of claims. Photographs of the project before, during and after completion of the work will be taken and kept on file as proof of accomplishments, for environmental purposes, and to utilize the best of the projects as a marketing tool.

All homeowner rehab projects will be administered by Lowcountry Council of Governments (also the administering agent for LRHC). LCOG will contract with a rehab specialist to do cost estimates and inspections. Site visits will be made by LCOG's staff to homes during the construction to ensure compliance with written rehab standards.

CHDO Monitoring: The CHDO administering the new construction project has not been identified. LRHC will monitor the CHDO at least annually. In order to chart project progress, these sub-grantees will be required to provide a written progress report on a quarterly basis for their project(s). In these progress reports, the LRHC will require the CHDO to describe project status, any project obstacles that have occurred, and to confirm or revise project schedules or budgets (if applicable). Onsite monitoring will be to ensure program compliance, effective management and performance achievement.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

2014 Annual Action Plan Lead-based Paint response:

The LRHC will address lead-based paint hazards in pre-1978 homes. The following is an outline of strategies to be used in the HUD HOME-sponsored activities:

- 1) Provide information, education, and outreach activities on lead-based paint hazard reduction through workshops and technical assistance to recipients of HOME funds.
- 2) Continue to require lead-based paint hazard reduction procedures to comply with HUD requirements.
- 3) Continue to notify residents and owners of all houses receiving HOME assistance of the hazards of lead based paint.
- 4) Require defective paint assessment when targeted HOME-assisted pre-1978 homes are being inspected and evaluated for possible rehabilitation.

Lead poisoning is a serious threat to children in the United States. Although anyone can suffer from lead poisoning, the effects of lead poisoning are most serious for children under age 6 because their nervous systems are still developing. Health effects in children can include permanent learning disabilities, behavioral problems, and severe developmental delays.

There are definite correlations between the year houses were constructed and the percentage of units estimated to contain lead. Approximately 90% of all houses build prior to 1940 in South Carolina are estimated to contain lead. In the Lowcountry region it is estimated that 54% of the housing stock has lead based paint present. The LRHC complies with all Federal and State regulations with regard to lead as they apply to all funded activities. Housing units built prior to 1978 are assessed for lead during the initial inspection. If lead is found, the homeowner is counseled about the risks of lead, how it can be contained, and if small children live in the unit, a referral is made to local health professionals for testing. A lead clearance is done on all units after rehabilitation activities have been completed. The LRHC, as part of its housing counseling activities, will review information on lead poisoning with all residents involved in HUD HOME-funded projects. Additionally, information and public awareness on the risks and dangers of lead poisoning are part of the LRHC's marketing and citizen participation program. On September 15, 2000, HUD's Lead-Safe Housing regulation became effective. This regulation addresses requirements for notification, evaluation, and reduction of lead based paint hazards in Federally-owned residential property and housing receiving Federal assistance.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.
2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

2014 Annual Action Plan Specific Objectives response:

- 1) **Priorities & Specific Objectives:** Based on results of the Citizens' Participation Plan and inter-agency consultation processes, the LRHC has developed the following strategies for its housing and community development policy:
 - Increase accessibility to adequate and affordable housing for all groups identified as being in need of affordable housing assistance;
 - Support the development and availability of safe, decent, and affordable housing;
 - Support housing initiatives to address homeless persons, persons with special needs, and the elderly;
 - Promote economic development opportunities by assisting in the creation and/or retention of jobs and improving workforce preparedness;

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- Promote the development of viable communities through non-housing community development, such as the provision of adequate infrastructure facilities and services.

Objectives to be undertaken to address meeting priority housing and community development needs in the Lowcountry are:

- A. Coordination of resources, organizations and institutions contributing to the provision of affordable housing and community infrastructure in the Lowcountry.
- B. Encourage the active involvement of all stakeholders to address the challenge of providing affordable housing and improved community and economic development for LMI households.
- C. Utilization of HOME funds for the development of affordable housing to include rehabilitation and new construction of rental and owner occupied units.
- D. Coordination of CDBG and State Housing funding resources along with other resource leveraging to increase housing activities to include new construction, rehabilitation, and affordable rental units.
- E. Identification and promotion of the usage of HOPWA funds to benefit the homeless through:
 - Renovation or rehabilitation of buildings and emergency shelters;
 - Provision of essential social services
 - Shelter operating expenses; and
 - Homeless prevention efforts.
- F. Promotion of public/private housing partnerships that develop units, further investment in low income housing, and ensure long-term affordability for low income persons.

Summary of Housing Needs:

Low income renters: Households renting and earning less than \$35,700 annually in Beaufort County or \$26,750 annually in Colleton, Hampton and Jasper Counties are classified as having very low or extremely low incomes. Many of these households receive various forms of public assistance including Section 8 rental assistance, food stamps, temporary assistance for needy families (TANF), the women, infant and children (WIC) program, Medicare, Medicaid, Supplemental Security Income (SSI), and veterans' benefits. The primary need among very low income renters is increased development – rehabilitation and new construction – and subsidy assistance for very low income and disabled individuals and families. Skills training, employment, and expanded permanent housing opportunities are needed in order to address the housing requirements of very low income renter in the long term. The short-term needs of this population are increased numbers of transitional housing units, increased availability of rental subsidy, and permanent affordable housing development.

Housing needs for other low income renters: Other low income rental households are those who rent and earn between 51% and 80% of the median family income, but do not qualify for Federal rental assistance under the Section 8 provisions. Households in this condition must seek housing in the private rental market. The primary housing needs of this population are to have a greater amount of rental housing available and incentive programs for landlords to rehabilitate their rental properties. More programs promoting developer/owner financing, public/private subsidy mixtures, and tax incentives are needed. Existing programs addressing housing development must be updated and better marketed to the private sector in order to encourage greater participation.

Low income first-time homebuyers: Many lower income potential homebuyers have great difficulty saving the amount needed for a down payment to purchase a home. These households typically revert to rental housing where it is available, even though the cost may be equivalent to or even more than a mortgage payment. Studies indicate that potential first time home buyers need down payment assistance and improved ability to access a variety of mortgage financing choices. More full service banks need to be cognizant of the needs of first time homebuyers in rural communities. There also needs to be increased education on purchasing and maintaining a home. First time homebuyers housing needs include:

- Incentive programs to increase home ownership opportunities;
- Down payment assistance;
- Improved access to conventional credit lending;
- Credit counseling, budgeting, and home maintenance programs for potential buyers.

Very low/extremely low income homeowners: Approximately 19,542 owner occupied households earn less than 50% of the median family income annually in the Lowcountry. These types of households include elderly persons on fixed incomes, young families with low wages, or single parent households. Housing needs for this population include continued funding of low interest loans or grants to address substandard housing conditions, particularly for elderly persons living on fixed incomes. Assistance in paying heating and cooling bills for the homes is needed as well.

Other low income homeowners: Other low income owner-occupied households in the Lowcountry face issues such as the need for property tax reduction and low interest loans/grants for home repairs. Particularly in the rural areas of the Lowcountry, fewer housing choices and lack of knowledge of available rehabilitation programs are also concerns.

2) Federal, State, and local public and private sector resources

Federal:

- Department of Housing & Urban Development
- Department of Agriculture: Rural Development
- Department of Commerce: Community & Economic Development

State:

- Department of Commerce: Division of Grants Administration
- Department of Social Services
- State Housing Finance & Development Authority
- Department of Environmental Control
- Department of Disabilities & Special Needs
- Rural Economic Development Council
- SC Department of Transportation

Local Government:

- Municipal and County Governments
- Public Housing Authorities

Non-Profit Organizations:

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- Community Housing Development Organizations
 - Non-profit Housing Development & Human Service Agencies
 - Community Action Agencies
 - Small Business Development Centers

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.
2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

2014 Annual Action Plan Public Housing Strategy response:

In Beaufort County, the Beaufort Housing Authority serves in the administration and delivery of rental assistance to low income households under HUD's Section 8 Rental Housing Certificate and Voucher Programs. For Colleton, Hampton and Jasper Counties, the State Housing Authority would provide the same access to LMI individuals. The Lowcountry Regional HOME Consortium will not own, operate, or manage any public housing units. The Housing Authorities offer resident initiative programs to their tenants. Due to decrease in funding LRHC will not provide funds for Tenant Based Rental Assistance this year.

The LRHC will continue to support the efforts of the local/State Housing Authorities that encourage home ownership, self-sufficiency, and youth development.

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

2014 Annual Action Plan Barriers to Affordable Housing response: LRHC updated its Analysis of Impediments in 2011.

The significant impediments affecting fair housing for all protected classes in the Lowcountry are discussed in the following section. A review of all the interviews indicated a pattern of prevalence for certain impediments. A commonality surfaced. These variables are listed in order of most-to-least significance. It should be noted that the first three items were mentioned in 95% of the interviews. The relationship of these three prominent items to each other is inseparable.

1. Inventory

Although there is presently a surplus of both rental and purchase dwelling units in the Lowcountry, there is a scarcity of available low-income rental housing and affordable housing for purchase by moderate-income households in the Region. Depressed markets in rural areas make affordable housing unattractive to some developers. Without sufficient profit potential, developers are not inclined to pursue the development of affordable housing.

Because of the shortage of such rental housing, the waiting list of those in immediate need of housing far surpasses the number of units available. It is not uncommon for a client to be on the list for twelve months, or even longer.

2. Transportation

The ideal situation would be to have adequate numbers of affordably-priced housing units located within walking distance of the Lowcountry's major employers and employment centers, as well as medical, educational, retail centers and services. This is not economically possible, because property values are actually higher nearer the places where jobs are most plentiful. Consequently, those persons in lower-paying jobs cannot afford to live near their places of work, school, shopping and health care. As a result, transportation—or the lack thereof—emerges as an impediment to fair housing in the Lowcountry.

3. Housing Affordability

Several agency executives referred to “affordable housing” as a misnomer. Housing affordability was the third most common impediment identified by interviewees. Incomes are distributed as unevenly as is growth in the Lowcountry, with Beaufort County ranking as the wealthiest and Hampton as the fourth poorest in South Carolina, according to data from the 2000 Census; only Beaufort County had incomes higher than the state average. However, without adjusting for the inflation that occurred over the course of the decade, the increases in incomes in all four counties were substantial.

The low wages of the working poor do not allow people to become self-sufficient. These working poor, along with those who are disabled, often require housing subsidies.

4. Shelters and Homelessness – Limited Facilities

Homelessness, and the resulting need for shelters, continues to receive little attention from the general public in the Lowcountry. This has been a persistent problem, especially in Beaufort County, where there has been a movement over the years to provide a homeless shelter; however the topic continues to be quite controversial. Two years ago, Family Promise of Beaufort County was started. This is a faith-based organization that serves homeless families. It does not provide a permanent shelter, but rather partners with faith based organizations to provide places to sleep (in church facilities, which provide accommodations on a weekly rotating basis), meals, transportation to employment if the adult is employed, job readiness assistance, financial literacy classes and parenting classes. In the last 12 months, 12 families have been accepted into the program. 8 families (38 individuals) have exited into housing, 2 families are currently still with the program, and 2 families exited prematurely due to non-compliance. Access Network is working with homeless individuals in the region.

5. Financial Illiteracy

Because of lack of knowledge concerning financing—especially of home purchases—low-income persons may not be aware of all of the potential resources available, they may not be aware of all of the implications involved in complicated subprime financing or they may become victims of predatory lenders. They may pay premium rates and be subject to unreasonable penalties. This can cause low-income clients to have poor or no credit, which ultimately affects qualifying for rental housing or purchasing a home. Several agencies and organizations require or make easily available classes for educating their clients concerning budgeting, borrowing, responsible loan repayments, record keeping and saving. Literature and instructions are offered in Spanish when necessary.

6. Local Government Participation

County and municipal governments within the Lowcountry Region have long addressed the provision of affordable as a planning goal or objective in their Comprehensive Plans. Because the state of South Carolina's 1994 Enabling Legislation requires a "Housing" element in all Comprehensive Plans, a review of the documents shows that most of them espouse planning policies that are supportive of the provision of affordable housing in the jurisdiction, although there are expressions of ambivalence in some. On the other hand, Zoning and Development Standards ordinances, as well as the ISO-required building codes in the southeastern coastal (i.e., hurricane-prone) areas of the Lowcountry, contain regulations of such stringency that the provision of affordable housing is constrained by the additional costs. In some jurisdictions, by means of goal-setting and/or incentives, the provision of affordable housing is actively encouraged.

Since each local government has its own zoning policy and practice, the impact on availability and development of affordable housing is significant. The lack of unified building codes or local codes threatens the health and safety of citizens and affects the quality and quantity of housing stock availability.

Most of the Comprehensive Plans and many of the Zoning or Development Standards Ordinances are being revised, existing policies and regulations may be changed considerably in the foreseeable future.

7. Discrimination

Most of the individuals interviewed indicated that they were not aware of overt discrimination in issues of housing, in race, gender or age categories. Mortgage discrimination data for the four Lowcountry counties is not available. The data is only available for Metropolitan areas, and at this time the Region does not have even one MDA or MSA. The legislation establishing the HMDA process specifically says that the data is required only of some financial institutions in MSAs/MDs, and there was no mention of any other geographic subdivisions or jurisdictions. We tried to find alternative sources of such information, but using all of the sources to which we have access, we could find nothing.

8. Special Client Categories

Older Population The Lowcountry's population aged 65 years and older grew significantly both in absolute numbers and as a percentage of the population between 2000 and 2009. There are long-term housing and social service implications related to the fact that large numbers of older persons are moving to the Lowcountry, especially as the number of very elderly persons (85 + years old) is also growing.

Housing is sparse and expensive. South Carolina is considered a retirement state, yet there are not nearly enough affordable senior communities for lower income residents. Many of the seniors that LCOG works with live in their own homes, perhaps for 30-plus years, and often these homes are in great disrepair. They cannot afford to make repairs and can not make the repairs themselves. At times they are choosing between medication, electricity and food.

With fewer choices available, and resources scarce, people are forced to stay where they are- in dilapidated homes. This often presents safety hazards- perhaps causing injuries which then lead to moving into nursing homes or moving in with family members. Disrepair of some homes is extremely apparent.

Single Parents with children family unit has increased nationally, and Jasper, Beaufort, Hampton and Colleton counties are experiencing the same impact.

In addition to financial burdens for housing, working parents are faced with providing childcare, having transportation for work and delivering the child to childcare, and living in a safe environment conducive to raising children.

Hispanic Residents seeking housing face problems with a language barrier, since few agencies have bi-lingual employees on staff. They are not familiar with housing agency procedures and have a basic fear of government and government agencies, particularly if they are illegal residents.

9. High cost of Housing

Between late-1998 and 2008, rapidly accelerating costs of land and construction and the cost of compliance with local building codes (particularly in Beaufort County) drove up the price for housing beyond the affordable range for low-income and moderate-income households.

In producing affordable housing, site and land development are major costs. Depending on the local government's standards, the diversity of costs can vary widely and can deter affordable housing development. Water and sewer permit costs, in particular, have been noted as costly items in land development. In some areas of the Lowcountry, particularly in Beaufort County infill work may be the more cost effective way to develop new affordable housing units.

Impediments to be addressed

LRHC will address the following impediments in the 2014 Annual Action Plan with HOME funds:

INVENTORY –

ACTIVITIES: NEW CONSTRUCTION & OWNER OCCUPIED SINGLE FAMILY REHAB.

PROJECTS:

- CHDO will construct 4 new homeownership units in Lowcountry Region earning less than 80% of the area median income.
- Hampton County will rehabilitate 5 owner occupied units scattered throughout the county benefitting 5 low to moderate income qualifying families earning less than 80% of the area median income.
- Colleton County will rehabilitate 5 owner occupied units in Colleton County outside of the City of Walterboro benefitting 5 low to moderate income families earning less than 80% of the area median income.
- Beaufort County will rehabilitate 5 owner occupied units (scattered site) in Beaufort County benefitting 5 low to moderate income families earning less than 80% of the area median income.

HOUSING AFFORDABILITY –

ACTIVITIES: NEW CONSTRUCTION

PROJECT:

- CHDO will construct 4 new homeownership units in Lowcountry Region earning less than 80% of the area median income.

HIGH COST OF HOUSING –

ACTIVITIES: NEW CONSTRUCTION

PROJECTS:

- CHDO will construct 4 new homeownership units in Lowcountry Region earning less than 80% of the area median income.

LRHC will work with the following agencies to address the other impediments to include:

TRANSPORTATION -

LCOG and Palmetto Breeze are working together and with SCDOT to provide more public transportation options to residents of the Lowcountry within the next few years. This includes implementing the Lowcountry Human Services Transportation Coordination Plan, which will include making agency transportation services available to the general public. Another initiative is the Bus Livability Grant that will result in public transit services in and around the City of Beaufort, with the possibility of long-term expansion into other parts of the Region. However, the lack of reliable, dependable and reasonably-priced transportation options will remain a significant impediment to fair housing for low-income residents for the foreseeable future.

SHELTERS AND HOMELESSNESS –

Family Promise of Beaufort County is a faith-based organization that serves homeless families. It does not provide a permanent shelter, but rather partners with faith based organizations to provide places to sleep (in church facilities, which provide accommodations on a weekly rotating basis), meals, transportation to employment if the adult is employed, job readiness assistance, financial literacy classes and parenting classes. In the last 12 months, 12 families have been accepted into the program. 8 families (38 individuals) have exited into housing, 2 families are currently still with the program, and 2 families exited prematurely due to non-compliance.

A survey of availability of homeless shelters in the four-county area indicates the following:

County	Shelters
Beaufort County	0
Jasper County	1 for men only
Hampton County	0
Colleton County	1 for women and children only

FINANCIAL ILLETERACY –

Jasper County Neighbors United, Lowcountry Habitat for Humanity and Hilton Head Habitat for Humanity offer homebuyers' education class. These classes, provided in conjunction with areas banks cover the following subjects:

- Defining needs and developing personal goals
- Advantages and disadvantages of homeownership
- Taking charge of your finances
- Learning to walk away if you can't afford it
- Predatory lending/subprime mortgages
- Tax advantages of homeownership
- Preparing and balancing a budget/types of expenses/Debt warning signs
- Cleaning up credit problems/Disputing errors/Credit "repair" clinics
- Consumer credit laws
- Foreclosure prevention
- Fair housing laws.

LOCAL GOVERNMENT PARTICIPATION –

County and municipal governments within the Lowcountry Region have long addressed the provision of affordable as a planning goal or objective in their Comprehensive Plans. Because the state of South Carolina's 1994 Enabling Legislation requires a "Housing" element in all Comprehensive Plans, a review of the documents shows that most of them espouse planning policies that are supportive of the provision of affordable housing in the jurisdiction, although there are expressions of ambivalence in some. On the other hand, Zoning and Development Standards ordinances, as well as the ISO-required building codes in the southeastern coastal (i.e., hurricane-prone) areas of the Lowcountry, contain regulations of such stringency that the provision of affordable housing is constrained by the additional costs. In some jurisdictions, by means of goal-setting and/or incentives, the provision of affordable housing is actively encouraged.

Since, at the present time, most of the Comprehensive Plans and many of the Zoning or Development Standards Ordinances are being revised, existing policies and regulations may be changed considerably in the foreseeable future. Comprehensive Plans will address providing affordable housing to include goals and objectives. Each participating county will pass a Fair Housing resolution and conduct other Fair Housing Activities throughout the year. Each participating county will contribute local match to the Consortium to provide affordable housing in the region.

DISCRIMINATION –

The South Carolina Human Affairs Commission will be contacted to determine the number and pattern of discrimination complaint activities. The following excerpt from the 2009-2010 Accountability Report of the South Carolina Human Affairs Commission indicates:

“The Commission’s key strategic goals are (a) to increase the number of discrimination complaint resolutions attained, while reducing the average processing time and maintaining the qualitative standards which have consistently ensured the agency’s actions withstand review by other relevant authorities, thereby providing our customers with timely, effective customer service.

At each Needs Assessment Public Hearing held at our municipalities we discuss Fair Housing. Information is given on discrimination and we give provide organization’s contact name, address and telephone number as a contact to report discrimination.

SPECIAL CLIENTS –

Older Population – The Lowcountry Area Agency on Aging (AAA) is federally mandated under the Older Americans Act to plan, coordinate and advocate for development of a comprehensive service delivery system to meet short- and long-term needs of senior citizens in the region. AAA staff works with federal, state and local officials, elderly constituents, service providers, volunteers and the private sector to coordinate existing services and encourage new ones. The AAA prepares a multi-year plan, which is updated annually, to identify the needs of seniors, existing services and gaps between the two. The plan sets objectives and priorities and specifies which services will be provided to meet defined needs.

Single Parents with children family unit – Beaufort Housing Authority provides Rental Assistance to Single Parents with children. County Libraries provide after school programs.

Hispanic Residents - Jasper County Neighbors United has plans to restart a program that from two years ago to offer programs for the First Time Home Buyer Education in Spanish. Unfortunately, one of the agencies serving the Hispanic Population, no longer exists. The Latin American Council (LAC) which assisted with finding work for day laborers, provided Spanish language parenting classes, and also helped Hispanics maneuver through the social service system in order to receive benefits, was forced to close its doors.

	RANKINGS PER INTERVIEWS	RANKINGS/ ADDRESSED W/HOME FUNDS	CAN ADDRESS WITH HOME FUNDS	CAN BE ADDRESSED IN PARTNERSHIP - NOT WITH HOME FUNDS
Inventory	1	1	X	

Transportation	2	7		X
Housing Affordability	3	2	X	
Shelters and Homelessness – Limited Facilities	4	5		X
Financial Illiteracy /Qualifying Clients	5	4		X
Local Government Participation	6	9		X
Discrimination	7	8		X
Special Client Categories	8	6		X
High cost of Housing	9	3	X	

Housing Resale and Recapture Guidelines

HOME funds for the Annual Action Plan beginning July 1, 2014, and ending June 30, 2015, will be utilized for the following activities outlined in “AVAILABLE FUNDING FOR BEAUFORT COUNTY/LOWCOUNTRY REGIONAL HOME CONSORTIUM”.

Resale, recapture requirements for all HUD HOME-funded activities are as follows:

The guidelines relating to resale and possible recapture of HOME Funds found in 24 CFR 92.254 and other related subsections will be incorporated into special purchase agreements between CHDO’s and/or sub-recipients and HOME program beneficiaries. The requirements are:

- a. Sub-recipients are required to place certain restrictions on assisted homebuyer properties in order to help preserve the affordable housing stock in their communities. If ownership of a property is transferred during the affordability period, these provisions are triggered. Communities have two options to ensure that HOME funds originally invested in the property continue to be used for affordable housing:

Recapture: Under the “recapture” option, the homeowner repays all or part of the HOME funds to the sub-recipient or PJ and is able to sell his/her home to any buyer at any price. Recaptured funds must be reused for HOME-eligible activities.

Resale: Under the “resale” option, an assisted homeowner is obligated to sell his/her property only to another HOME-eligible buyer at a price that is deemed by the PJ to be fair to both parties. This option ensures that the HOME-assisted unit remains affordable over the entire affordability term. If a unit is designated affordable and it is sold during the affordability period, the sale must meet the following criteria:

- 1) The new purchaser must be low income, meeting the HOME program’s definition, and occupy the property as the family’s principal residence.
- 2) The sales price must be affordable to the new purchaser. Affordable is defined by HOME Consortium as a maximum percentage of the purchaser’s income that can be used to pay the fixed costs of owning a home.
- 3) The original homebuyer, now the seller, must receive a fair return on his/her investment.

-
- 4) Sub-recipients must use deed restrictions, land covenants or other similar legal mechanisms to enforce these resale restrictions.

The LRHC has opted to work under the Recapture provision with all program activities and will stipulate that requirement with any subrecipients that we partner with to deliver programs HOME assistance.

The recapture provision is accomplished through a process of “Conditional Deferred Payment Loan (CDPL)” actions. LRHC will utilize a pro rata reduction of recapture amount during affordability period.

HOME Funds Provided	Affordability Period
<\$15,000	5 years
\$15,000 - \$40,000	10 years
>\$40,000	15 years
New construction or Acquisition of New construction(any amount)	20 years

LRHC has imposed a 5 year affordability period on homeowner rehabilitation projects. The amount to be recaptured will decrease 20% each year until year 5 at which time the loan is forgiven. The amount subject to recapture is the direct subsidy received the homebuyer.

LRHC has imposed a 20 year affordability period on the CHDO – New Construction project. The amount to be recaptured will decrease 5% each year until year 20 at which time the loan is forgiven. The amount subject to recapture is the direct subsidy that enabled the homebuyer to purchase the property (the difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance).

LRHC's will recapture the direct subsidy received by the homebuyer. Only the direct subsidy received by the homebuyer is subject to recapture. Our recapture provision limits the amount to be recaptured to the net proceeds of the sale.

The purpose of this program is to provide assistance to low and moderate income homeowners to rehabilitate their dwellings or to low and moderate income families attempting to purchase a home. A Conditional Deferred Payment Loan is a non-interest loan (0% interest rate) to be used for these purposes. It is conditional because the loan graduates into a grant as it matures over the affordability period. The loan decreases for a portion of the assistance provided each year as long as the homeowner retains title to the property or occupies the structure as a legal residence. The loan is made directly to the qualified homeowner and will be secured through an agreement which can be recorded against the property in the form of a lien. No monthly

payment is required on the lien provided the recipient of funds adheres to the provisions of the agreement. The grantee will hold the lien of record on the property.

If the homeowner ceases to occupy the property as his legal residence or if the title is transferred, the remaining balance of the loan becomes due and payable to the lien holder immediately. The governing body should be notified of any pending action to transfer ownership of such property.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Sources of Funds—Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.
2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.
3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness by 2014. Again, please identify barriers to achieving this.
4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.
5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.

2014 Annual Action Plan Special Needs response:

- 1) The LRHC does not expect to receive any funds in the next year to address homeless needs and to prevent homelessness
- 1) Homelessness – Challenges and Barriers: The principle challenge identified in preventing and eliminating homelessness continues to be centered on lack of permanent affordable housing. The LRHC feels that we will not be successful in ending homelessness until it can produce more housing and make it affordable to very poor people, including single people with disabilities. Transitional Housing and emergency shelters do not offer long term

commitments and there continues to be inconsistencies in the eligibility criteria and length of services allowable for people in different configurations of transitional housing. Additionally, it is difficult to serve sub-populations such as:

- The chronically homeless with mental illnesses and/or substance abuse problems;
- Youth
- Large families and/or families with teenage sons and sex offenders.

Homeless Strategy:

The LRHC will during the 2014-2015 year cycle to broaden the scope of planning, incorporating additional funding sources and increasing the participation of mainstream agencies in order to better meet the changing needs of the homeless. With greater involvement from mainstream agencies, there will be an increase in the prevention of homelessness, thereby expanding the availability of affordable housing. The prevention aspect will focus on mental health, substance abuse, and even corrections agencies doing a better job of assuring that people released from their facilities have stable housing and any supportive services that are needed to prevent them from ending up homeless. In addition, resources to avert eviction, pay rent or utility arrearages, do some financial counseling, and otherwise handle situations of imminent homelessness – usually for families, often play a significant role on the prevention side. The affordable housing aspect means doing something serious about the often impossibly tight and expensive housing market facing the homeless and other very poor people and requires a very long term vision and commitment. Comprehensive broad-based planning, encompassing mainstream services and multiple funding sources, benefits from sharing the burden of solving homelessness among the many players and relying on having access to a broader array of services.

Emergency Shelter Grants (ESG)

(States only) Describe the process for awarding grants to State recipients, and a description of how the allocation will be made available to units of local government.

2014 Annual Action Plan ESG response:

Not applicable.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

-
2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

*Note: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

2014 Annual Action Plan Community Development response:

- 1) The LRHC does not expect to receive any funds in the next year other than from South Carolina Department of Commerce.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

2014 Annual Action Plan Antipoverty Strategy response:

Through the creative use of HOME, CDBG, State Housing funding, and integrated sources of other Federal and State programs, the LRHC's anti poverty strategy is closely coordinated with the affordable housing and community development strategies presented in the Consolidated Plan, in order to achieve the following:

- A. Provide a range of services/activities having a measurable impact on causes of poverty in those areas of communities where poverty is a particularly acute problem;
- B. Maintain/expand the stock of affordable housing to reduce the financial burden on persons with low/moderate incomes and enhance the viability of rural communities.
- C. Assist LMI individuals in securing/retaining meaningful employment;
- D. Assist LMI individuals in obtaining/maintaining adequate housing and suitable living environments;
- E. Provide access to resources, IR&A for those individuals and families who have immediate and urgent needs, including the need for health services, nutritional food, housing, and employment-related services.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.
2. Describe how Federal, State, and local public and private sector resources that are

reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

2014 Annual Action Plan Specific Objectives response:

There are several types of groups in the Lowcountry which have special housing needs. These populations include:

- The elderly
- Battered spouses/abused children
- The severely disabled (physically or mentally)
- Persons with HIV/AIDS

There are some common issues that all these populations share.

- A. Limited Incomes- The majority of special needs groups have limited incomes. This can be evidenced in the elderly not working, the limited employment opportunities for the disabled, the inability of HIV/AIDS patients to maintain employment, and the seasonal aspect of migrant workers.

Programs that assist these populations include Temporary Assistance for Needy Families (TANF); disability benefits – Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI); food stamps; and unemployment insurance. The amount of income for special needs persons is directly related to their ability to secure or maintain adequate housing. Special needs persons with financially supportive family members, secure employment, and other financial resources have the adequate housing. However, those without these resources must rely primarily on public assistance and subsidized housing to meet basic needs.

- B. Independent living arrangements- Living independently to the best of their abilities is a need for all special needs populations. No one wants to have to rely on others for basic necessities. Small group living arrangements in single family homes, specialized apartment communities, and designated units in open market apartment communities provide special needs populations with the ability to improve their quality of life and address their housing needs.
- C. Social services- The provision of social services to special needs populations continues to be a need. Programs through the Older Americans Act (OAA) and other State and Federal initiatives allow the elderly to live independently while still ensuring that they receive adequate nutrition. Providing counseling services within the home of the resident also allows for independent living while treatment is taking place.
- D. Isolation- Historically, persons with special needs have been separated from traditional living arrangements. Consequently, stereotypes developed about how these populations lived and whether it was healthy and safe to live near them. This kind of isolation from the rest of society is no longer seen as being beneficial to the development and recovery of special needs groups.

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- E. Transportation- Given limited incomes and accessibility, transportation is vital to the lives of all special needs groups. In rural areas, accessible public transportation is a necessity to enable people to maintain employment, receive services, and seek treatment for their specific needs.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Affirmative Marketing

LRHC will market all programs in accordance with federal fair housing laws. Realtors, builders and individuals seeking housing opportunities will be targeted to receive information housing programs. LRHC will not address any projects with more than 5 units this year.

Minority Outreach

LRHC Affirmative Marketing program will reach minorities to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

Veterans

We will be inclusive & make sure veterans are considered. Make reasonable effort to outreach to them and make sure they are knowledgeable about our programs and able to participate in our activities. We will contact each Veteran's Affairs Office in our region and provide information about our programs.

Fair Housing

Beaufort County/Lowcountry Regional HOME Consortium's member local governments will continue to affirmatively further fair housing.

April is declared "Fair Housing Month" throughout the LRHC geographic area. Each County government and municipalities will enact a resolution during this program year which will be published along with the Notice of Nondiscrimination. LRHC continues to actively work with units if local government and the public to promote Fair Housing.

Many actions are part of an ongoing process. Some Fair Housing activities in the LRHC's geographic area include: PSA concerning Fair Housing, Poster Contests, Fair Housing education at public hearings, Fair Housing Public Forum and other Fair Housing activities.

Required Local Match

LRHC will meet its required 25% match by contributions received from each member county pro-rated by population as outlined in the Intergovernmental Agreement establishing the LRHC and sweat equity and donated labor. Local Funds totaling \$102,715 will serve as the 25% match obligation (\$410,860).

DRAFT

Table 3A

**Summary of Specific Annual Objectives
Beaufort County/Lowcountry Regional HOME Consortium
2014 Annual Action Plan**

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Expected Number
	Owner Housing Objectives			
1	Improve the quality and availability of decent, safe and affordable housing	HOME	PIC DH-2	4 units
2	Preserve existing affordable housing through rehab of LMI owner-occupied substandard housing units	HOME	PIC DH-2	15 units

***Outcome/Objective Codes**

	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

ABLE 3B ANNUAL HOUSING COMPLETION GOALS					
ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)	Annual Expected Number Completed	Resources used during the period			
		CDBG	HOME	ESG	HOPWA
Acquisition of existing units		<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>
Production of new units	0	<input type="checkbox"/>			<input type="checkbox"/>
Rehabilitation of existing units	0	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Rental Assistance	0	<input type="checkbox"/>			<input type="checkbox"/>
Total Sec. 215 Rental Goals	0	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)					
Acquisition of existing units	4	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Production of new units		<input type="checkbox"/>			
Rehabilitation of existing units	15	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Homebuyer Assistance		<input type="checkbox"/>			<input type="checkbox"/>
Total Sec. 215 Owner Goals	19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)					
Homeless		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-Homeless		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Special Needs		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Sec. 215 Affordable Housing		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ANNUAL HOUSING GOALS					
Annual Rental Housing Goal	0	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Annual Owner Housing Goal	19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Total Annual Housing Goal	19	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

For the purpose of identification of annual goals, an assisted household is one that will receive benefits through the investment of Federal funds, either alone or in conjunction with the investment of other public or private funds.